

EXHIBIT GGG

UNITED STATES DISTRICT COURT
IN AND FOR DADE COUNTY, FLORIDA

CASE NO. WDQ-02-CV-648

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

and
KATHY KOCH,

Plaintiff-Intervenor,

v.

LA WEIGHT LOSS,

Defendant.

VIDEOTAPED DEPOSITION OF EILEEN STANKUNAS
VOLUME II

Monday December 6, 2004
10:30 a.m. - 5:35 p.m.

One Biscayne Boulevard
Miami, Florida

Reported By:
Judith M. Caputo, Shorthand Reporter
Notary Public, State of Florida
Esquire Deposition Services
Miami Office
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1 LA Weight Loss?
 2 A. Not the date or when.
 3 Q. But do you recall she was fired?
 4 A. She was let go, yes.
 5 Q. Do you know who made the decision to fire
 6 her?
 7 A. It probably was -- and I don't remember it
 8 all, but leaving her go would have entailed Vahan's
 9 decision on that, also.
 10 Q. But you don't --
 11 A. No, I don't remember --
 12 Q. -- sitting here today --
 13 A. No.
 14 Q. -- you don't recall who made the decision to
 15 fire her?
 16 A. No. I don't, no.
 17 Q. Since you started at LA Weight Loss, and I'm
 18 talking about not just since the company was known as
 19 LA Weight Loss, but starting when it was Quick Weight
 20 Loss, also, the whole timeframe, did you hire any
 21 males?
 22 A. Yes.
 23 Q. For what positions?
 24 A. Counselors.
 25 Q. When?

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1 A. Various times.
 2 Q. Did you hire any males after January 1st, 1997?
 3 A. I don't remember.
 4 Q. How many males did you hire for counselor
 5 position?
 6 A. Don't remember.
 7 Q. Do you recall any of their names?
 8 A. No.
 9 Q. Were these hires prior to becoming senior
 10 vice-president?
 11 A. Yes.
 12 Q. Were these hires prior to becoming a general
 13 manager?
 14 A. I'm not sure, but I would say, yes, due to
 15 the fact that I was far removed as a general manager
 16 hiring counselors.
 17 Q. Okay. Do you recall whether these hires were
 18 prior to being a director of center operations?
 19 A. Say that again, please.
 20 Q. Do you recall whether these male hires
 21 were -- any of them were prior to -- Well, let me
 22 withdraw and rephrase.
 23 Were any of these male hires for counselor
 24 during the timeframe that you served as a director of
 25 center operations?

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1 A. I'm not sure.
 2 Q. Do you recall what centers they were hired
 3 for?
 4 A. No.
 5 Q. Have you ever hired a male for any position
 6 other than counselor at LA Weight Loss?
 7 A. No.
 8 Q. Do you recall whether these males who you
 9 hired were ever promoted to higher positions?
 10 A. No.
 11 Q. You don't recall?
 12 A. I do not recall.
 13 Q. When you say you hired these males, do you
 14 mean that you personally made the decision to hire
 15 them?
 16 A. I didn't personally hire them, that I can
 17 remember. So I don't want to say that I did, but I
 18 know that when they -- as well -- now we're going back
 19 in the beginning. I had a lot of input on everything,
 20 but I was growing the company, so I gave a lot of
 21 decisions, like I said before, that I had to trust
 22 their decision and went along with it.
 23 Q. So these were hires by subordinates, but
 24 within your territories?
 25 A. Yes.

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1 Q. Did you ever have an opportunity to observe
 2 the work of any of these male hires?
 3 A. Yes.
 4 Q. Did you form any impression as to the quality
 5 of their work?
 6 A. Yes.
 7 Q. What was your impression?
 8 A. None of the women wanted to be weighed by the
 9 men. Not only did they want -- and they refused to
 10 have the male weigh them, nor would they sit and tell a
 11 man that they ate three cherry pies and a pizza, and
 12 they just wouldn't say that. They did not feel
 13 comfortable.
 14 And also has backfired on me quite a lot --
 15 well, quite a lot, once, twice. I don't remember when,
 16 I don't remember the person, but a male measured a
 17 woman and measured her inappropriately. The woman
 18 complained, and it could have turned into a case, but
 19 the woman was nice enough.
 20 Another male made an advance to a woman, and
 21 she came to me crying. And I sat down with him, I told
 22 him, he promised me that he wasn't inappropriate with
 23 the behavior. She came back the next time, and he gave
 24 her his phone number and stuck it in her hand.
 25 So, it's -- it has, as far as I've been in